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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

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ELIZABETH HERNANDEZ,

Plaintiffs,

v.

ROB KOLKMAN, CONSTABLE  
KOLKMAN LLC, and JOHN DOES 1-  
5,

Defendants.

**STIPULATED MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO PLAINTIFFS MOTION FOR RULE  
11 SANCTIONS**

Case No.: 2:23-cv-00772

Judge Ann Marie McIff Allen  
Magistrate Judge Daphne A. Oberg

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Defendants, Rob Kolkman and Rob Kolkman LLC (collectively “Defendants”), by and through their counsel of record, and Elizabeth Hernandez, by and through her counsel of record, hereby move the court for an extension for Defendants to file their Response to Plaintiff’s Motion for Rule 11 Sanctions (ECF 87) by one day. The current deadline for Defendants’ Response is September 10, 2025, which has not expired. The Parties therefore agree and stipulate that a deadline of September 11, 2025 is reasonable, and respectfully ask that the Court grant the accompanying proposed Order to that effect, which is attached hereto as Exhibit A (and emailed concurrently to the Court.)

**DATED** the 10<sup>th</sup> day of September 2025.

**GORDON REES SCULLY  
MANSUKHANI, LLP**

/s/ *J. Tyler Martin*  
J. Tyler Martin

*Attorneys for Rob Kolkman and Constable  
Kolkman LLC*

**STEPHENSON LAW FIRM**

/s/ *Eric Stephenson*  
Eric Stephenson  
*Attorney for Plaintiff Elizabeth Hernandez*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 10, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing

/s/ *Maria Rubi*